EXHIBIT 1



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January 29, 2009

BY ELECTRONIC AND REGULAR MAIL

David J. Strachman, Esq. McIntyre, Tate & Lynch LLP 321 South Main Street Suite 400 Providence, RI 02903

> Re: <u>Sokolow, et al. v. Palestine Liberation Organization, et al.</u> C.A. No. 04cv397 (GBD) (RLE) (SDNY)

Dear Dave:

I am enclosing herein service copies of defendants The Palestinian Authority's ("PA") and The Palestine Liberation Organization's ("PLO") Objections and Answers to Plaintiffs' Personal Jurisdiction Interrogatories and Objections and Responses to Plaintiffs' Personal Jurisdiction Request for Documents.

With respect to the Objections and Answers to the Interrogatories, I will send you verifications as soon as possible. I hope to provide you next week with a projected date for transmitting the verifications. With respect to the Objections and Responses to the Document Requests, you should have received today, by overnight mail, copies of non-privileged documents that the Defendants have produced in response to Plaintiffs' documents requests, subject to and without waiving Defendants' objections thereto. Please let me know if, for some reason, you did not receive those documents.

With respect to the depositions you have requested for Ambassador Abdel Rahman and Dr. Al-Kidwa, and leaving aside whether the Defendants have a legal obligation to produce those two individuals in New York City or elsewhere for purposes of personal jurisdiction discovery, I have been informed that both gentlemen are willing to appear for their depositions under the following circumstances.

Ambassador Abdel Rahman currently serves as the PLO's ambassador to Morocco. He is willing to travel to New York City for his deposition as you requested, but, given the demands of his position and his schedule, he would not be able to appear in New York City until a



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mutually-convenient date during the first two weeks in March, 2009. If you wish to depose him at an earlier date in Morocco, please let me know, and I will determine when and how that might be possible. If you wish to depose Ambassador Abdel Rahman in New York City, please let me know your available dates during the first two weeks of March, 2009, and I will determine if Ambassador Abdel Rahman is also available on those dates.

Mr. Al-Kidwa lives and works in Ramallah and can be available for a deposition in Ramallah as early as next week. Anticipating your objection to conducting the deposition in Ramallah, we can offer East Jerusalem as an alternate location for a deposition next week, assuming the Israeli authorities allow Mr. Al-Kidwa's passage to East Jerusalem. Furthermore, if that timing is too short notice regarding Mr. Al-Kidwa's availability, we would be happy to discuss with you alternate dates and locations. Mr. Al-Kidwa is on travel beginning February 7, and the scheduling and location of any deposition thereafter would require discussion and coordination given his schedule. In the meantime, please let us know immediately if you are available for a deposition next week in the locations indicated above.

Sincerely,

Enclosures

cc: Olimpio Squitieri, Esq. (via regular mail) (w/enclosures) Richard A. Hibey, Esq. (w/o enclosures)